

May 28, 2019

BY ECF

Hon. Barbara Moses
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
Courtroom 20A
New York, NY 10007

Re: *Lek Securities Corp., et al. v. Nicolas Louis, et al.*,
Case No. 1:19-cv-02142 (RMB/BCM)
Joint Letter on Status of Discovery and Settlement Efforts

Dear Judge Moses:

This joint status letter is respectfully submitted in response to Your Honor's Order, dated May 9, 2019 (ECF No. 90) (the "Order"), instructing the parties to submit a joint letter "outlining the progress of discovery to date, including any outstanding discovery disputes requiring judicial resolution, and updating the Court on the parties' settlement efforts, if any. If no discovery controversies exist at that time, the parties may request that the conference [scheduled for May 29, 2019 at 9:00 a.m.] be held telephonically."

By letter dated May 20, 2019 (ECF No. 95), the parties notified Judge Berman that the parties had reached a settlement in principle and were working out the final details. We write to inform you that the parties are finalizing a binding memorandum of understanding and are hopeful that it will be completed by the end of this week. Accordingly, the parties jointly request that the conference scheduled for tomorrow be adjourned for a week (or to another date that is acceptable to the Court). If an adjournment of the conference is not acceptable to the Court, the parties jointly request that tomorrow's conference be held telephonically.

There are no current discovery disputes that require judicial resolution. In the unlikely event that the parties are unable to finalize a binding memorandum of understanding this week, the parties will contact the Court to request an extension of the discovery deadlines.

Respectfully submitted,

/s Mark D. Meredith

Mark D. Meredith

cc: All Counsel of Record